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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	
	:	Chapter 11 Case No.
	:	
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	08-13555 (JMP)
	:	
	:	
Debtors.	:	(Jointly Administered)
	:	
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DECLARATION OF JUNYA NAITO

Pursuant to 28 U.S.C. § 1746, Junya Naito declares as follows:

1. I am an attorney, a *bengoshi*, admitted to practice in Japan and a member of the law firm of Momo-o, Matsuo & Namba, attorneys for Lehman Brothers Holdings Inc. ("LBHI") and certain of LBHI's affiliates in the civil rehabilitation proceedings of certain of LBHI's Japanese affiliates, including Sunrise Finance Co., Ltd. ("Sunrise Finance").

2. I submit this declaration in support of Debtors' Motion Pursuant To Sections 105(a) And 362 Of The Bankruptcy Code For An Order Enforcing The Automatic Stay And Holding Shinsei Bank In Contempt For Violating The Automatic Stay.


3. Attached hereto as Exhibit 1 is a true and complete copy of the proposed Sunrise Finance rehabilitation plan submitted by Sunrise Finance to the Tokyo District Court and Makoto Tahira, Esq., Supervisor of the civil rehabilitation proceedings for Sunrise Finance (the "Supervisor") on May 15, 2009. It is my understanding that Sunrise Finance plans to submit a slightly revised version of the plan in the near future.

4. Attached hereto as Exhibit 2 is the true and complete copy of the proposed Sunrise Finance rehabilitation plan submitted by Shinsei Bank to the Tokyo District Court and the Supervisor on May 15, 2009.

5. Attached hereto as Exhibit 3 is a true and complete copy of the "Opinion" submitted by Shinsei Bank to the Tokyo District Court and the Supervisor on June 26, 2009.

6. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: Tokyo, Japan
August 10, 2009.



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